

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Blue Ridge Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Bassett Furniture Industries, Inc. - BFI Bassett  
2611 Fairystone Park Highway, Bassett, Virginia  
Permit No. BRRO-30284

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Bassett Furniture Industries, Inc. – BFI Bassett has applied for a Title V Operating Permit for its Bassett, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_  
Lillian Alexander  
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Date:

Air Permit Manager: \_\_\_\_\_  
David J. Brown

Date:

Regional Director: \_\_\_\_\_  
Robert J. Weld

Date:

## **FACILITY INFORMATION**

### Permittee

Bassett Furniture Industries, Inc.  
P.O. Box 626  
Bassett VA 24055

### Facility

BFI Bassett  
2611 Fairystone Park Highway  
Bassett VA 24055

County-Plant Identification Number: 51- 089-0033

## **SOURCE DESCRIPTION**

NAICS Code: 337122 – Non-upholstered Wood Household Furniture Manufacturing

BFI Bassett (formerly Bassett Table Company and Superior Lines)

This facility used to manufacture wood furniture, receiving rough cut wood and shipping out finished furniture. On February 17, 2010 Bassett entered into a mutual determination of permanent shut down for its two boilers (BL1 and BL2) and all woodworking equipment (T-WW and S-WW). On November 3, 2011 Bassett entered into a mutual determination of permanent shut down for all finishing equipment (T-FN1 and S-FN1) except for one spray booth SB-13. Consequently the only equipment left is the one spray booth.

The facility is no longer a Title V major source however a Title V permit is still required since, due to “once in, always in” it is still subject to the Wood Furniture MACT (JJ). This source is located in an attainment area for all pollutants and is a PSD minor source. There are no underlying NSR permits.

The facility's original Title V operating permit was issued on February 1, 2002. This is the second renewal. The applicant did not submit the renewal application six months prior to the current Title V permit's expiration (March 14, 2012) consequently there is no permit shield.

## **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, was conducted on July 7, 2010. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

## EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Furniture Finishing Equipment</b>							
SB-13		Spray booth	Unkn.	Baffle particulate filters	--	PM, PM10	none

## EMISSIONS INVENTORY

Emissions for 2010 are summarized in the following tables.

2010 Actual Emissions

	2010 Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO <sub>2</sub>	PM <sub>10</sub>	NO <sub>x</sub>
Spray booths	0.023	0	0	0.002	0
Total	0.023	0	0	0.002	0

2010 Facility Hazardous Air Pollutant Emissions

Pollutant	2010 Hazardous Air Pollutant Emission in Tons/Yr
Toluene	0.003
Xylenes	0.001

## EMISSION UNIT APPLICABLE REQUIREMENTS – Furniture Finishing Equipment

The finishing equipment (spray booth) is subject to the requirements of 40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations. Bassett has elected to comply with the MACT by using compliant coatings or VHAP averaging. The permit includes all applicable requirements for these compliance alternatives to Subpart JJ.

### State Limitations

Limitations associated with state regulations are as follows:

- Particulate emissions from spray booth SB-13 will be controlled by baffle particulate filters or a DEQ approved equivalent method.
- Visible emissions from spray booth SB-13 shall not exceed twenty percent (20%) opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed sixty percent (60%) opacity. (existing source standard Rule 4-1 for visible emissions)

Limitations associated with MACT JJ are included in the permit as follows:

- VHAP weighted average limits for finishing operations or compliant finishing material limitations, or a combination of averaging and compliant coatings.
- Strippable paint booth coatings VOC limits.
- Compliant contact adhesive VHAP limits.
- Work Practice Implementation Plan requirements.
- Operator Training requirements.
- Inspection and Maintenance Plan requirements.
- Cleaning and Washoff Solvent accounting system requirements.
- Spray booth cleaning requirements.

- Storage requirements for materials used.
- Application equipment requirements.
- Line cleaning requirements.
- Gun cleaning Requirements.
- Washoff operations requirements.
- Formulation Assessment Plan for finishing operation requirements.
- Operation and maintenance requirements.

### **Monitoring and Recordkeeping**

Monitoring is required as follows:

- Maintenance and operating procedures are specified.
- When the spray booth is in operation, daily visible emission observations shall be conducted. The presence of visible emissions shall require the permittee to take timely corrective action such that the unit resumes operation with no visible emissions or conduct a visible emission evaluation (VEE) in accordance with EPA Method 9 for a minimum of 6 minutes to assure visible emissions are 20 percent opacity or less. If any of the 15-second observations exceeds 20 percent, the observation period shall continue for a total of 60 minutes. If compliance is not demonstrated by this VEE, timely corrective action shall be taken such that the equipment resumes operation with visible emissions less than or equal to 20 percent opacity.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- Records of maintenance, inspections and training
- Records of visible emission and opacity observations

The preceding monitoring and recordkeeping is considered sufficient to demonstrate compliance with the visible emission limit for the spray booth.

Monitoring associated with MACT JJ is included in the permit as follows:

- Averaging calculation for finishing operations using averaging.
- Compliance certification requirements for finishing operations using compliant coatings.
- Compliance certification requirements for contact adhesive operations using compliant adhesives.
- Compliance certification requirements for strippable spray booth coatings using compliant strippable spray booth coatings.
- Compliance certification requirements for work practice standards.

Recordkeeping associated with MACT JJ is included in the permit as follows:

- Certified product data sheets for materials used at the facility.
- If the averaging method is used, copies of averaging calculations, including documentation to support the calculations.
- Records to demonstrate compliance with the work practice implementation plan.
- Compliance certification records required by the MACT, including all other information submitted with the compliance status or semiannual reports.

Records to demonstrate compliance with the MACT must be maintained for a period of 5 years. DEQ has evaluated the monitoring and recordkeeping requirements associated with MACT JJ and considers them sufficient to demonstrate compliance with the MACT limitations included in the permit.

### **Testing**

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

### **Reporting**

The reporting requirements of the Title V General Conditions (§VII of the permit) apply to this facility.

Reporting associated with MACT JJ is included in the permit as follows:<sup>1</sup>

- Semi-annual reports to meet the requirements of Subpart JJ
- Written notification if the facility exceeds the baseline level of material usage as outlined in Subpart JJ.

### **Streamlined Requirements (from March 15, 2007 Title V permit)**

Sections III (Boiler Requirements), IV (Woodworking Equipment Requirements) and V (Furniture Finishing Requirements) pertaining to all equipment except SB-13 have been deleted since this equipment has been shut down.<sup>2</sup>

Section VI (Facility-Wide Conditions – Wood Furniture MACT (40 CFR 63 Subpart JJ))

- Condition VI.A.2.a. (now IV.A.2.a.) – the sentence “The plan shall be developed no more than 60 days after the compliance date.” has been streamlined out since the compliance date has passed.
- Condition VI.A.2.b. (now IV.A.2.b.) – the sentence “All existing personnel shall be trained within six months of the compliance date.” has been streamlined out since the compliance date has passed.

Condition VI.E.1 (Reporting) for MACT JJ Notification of Compliance has been dropped – this is an initial notification requirement that has been fulfilled.

### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also

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<sup>1</sup> EPA desires electronic submittal of annual compliance certification only; that and all other reports are submitted in writing to the Blue Ridge Regional Office

<sup>2</sup> Sections III, IV and parts of V have been deleted rather than streamlined out. The equipment has been shut down so there are no longer applicable requirements.

requires notification of deviations from permit requirements or any excess emissions.

## **Comments on General Conditions**

### **B. Permit Expiration**

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

### **F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

### **J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

### **U. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on General Condition F.

### **Y. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

## **STATE ONLY APPLICABLE REQUIREMENTS**

There are no State Only applicable requirements.

### **FUTURE APPLICABLE REQUIREMENTS**

There are no Future applicable requirements.

### **INAPPLICABLE REQUIREMENTS**

The Plywood and Composite Wood Products MACT (Subpart DDDD) no longer applies since all gluing operations have ceased and equipment subject to this MACT has been removed from the facility.

No inapplicable requirements were identified by the applicant.

There are no applicable GHG permitting requirements.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A.4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

### **COMPLIANCE PLAN**

This facility is not subject to a compliance plan.

### **INSIGNIFICANT EMISSION UNITS**

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation <sup>1</sup> (9 VAC_)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
<i>None identified</i>				

<sup>1</sup>The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate



**CONFIDENTIAL INFORMATION**

There is no confidential information associated with this permit application.

**PUBLIC PARTICIPATION**

The draft permit was placed on public notice in the Martinsville Bulletin from December 23, 2011 to January 23, 2012. No comments were received during that time.

The proposed permit was emailed to EPA Region III for review when the public notice period ended. The required 45-day review period is January 24, 2012 to March 8, 2012. On March 6, 2012 DEQ received written comments via email from Richard Killian. Richard stated that he did not have substantial comments regarding the renewal.